

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.¹

Chapter 11

**TENTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR ALLOWANCE OF
FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE DEBTORS FROM
MAY 1, 2025 THROUGH MAY 31, 2025**

1. Steven R. Kinsella and Fredrikson & Byron, P.A. (collectively, “Fredrikson”) make this Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as Chapter 11 counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) between May 1, 2025 and May 31, 2025 pursuant to 11 U.S.C. § 330.

2. In support of this Application, Fredrikson respectfully states as follows:

JURISDICTION

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

¹ In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

BACKGROUND

5. On the Petition Date, the Debtors filed an application to employ Fredrikson as Chapter 11 counsel for the Debtors effective July 8, 2024. (ECF No. 13.) The Court approved the application to employ Fredrikson on July 25, 2024. (ECF No. 49.) A copy of that order is attached as **Exhibit A**.

6. On the Petition Date, the Debtors also filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024 granting the motion and allowing Fredrikson to file monthly applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.

7. This is Fredrikson’s tenth application for allowance of fees and expenses under 11 U.S.C. § 331. Fredrikson received court approval for the following prior fee applications:

<u>Fee Application Amount</u>	<u>Date of Order Approving Fee Application</u>	<u>Docket No.</u>
\$80,535.96	10/21/2024	148
\$20,172.00	11/14/2024	164
\$37,675.00	12/13/2024	182
\$42,291.00	1/15/2024	206
\$36,048.00	2/12/2025	221
\$45,102.50	3/14/2025	254
\$63,066.00	4/8/2025	267

<u>Fee Application Amount</u>	<u>Date of Order Approving Fee Application</u>	<u>Docket No.</u>
\$70,698.00	5/1/2025	280
\$69,159.07	6/16/2025	373
\$464,747.53		

8. Fredrikson believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

RELIEF REQUESTED

9. **Postpetition Fees.** By this Application, Fredrikson requests allowance of fees for professional services rendered during these Chapter 11 cases between May 1, 2025 and May 31, 2025 in the amount of **\$91,520.00**, and reimbursement of expenses in the amount of **\$5,359.17**, for a total of **\$96,879.17**.

10. The professional services rendered by Fredrikson are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

(5001) Asset Analysis and Recovery: \$37,846.00

Services include strategizing on use of discovery tags in Disco and search terms for future document production; maintaining regular communications with the Chief Restructuring Officer (“CRO”) regarding document production, asset analysis, and ongoing adversary proceedings and settlements; conducting document review for discovery purposes in various adversary proceedings; reviewing the status of all garnishments to date; and assessing subsequent steps in analyzing affirmative defense issues.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
James C. Brand	0.1	2025	\$690	\$69.00
Steven R. Kinsella	13.8	2025	\$635	\$8,763.00
Katherine A. Nixon	22.6	2025	\$485	\$10,961.00
Kari Alstad	13.4	2025	\$265	\$3,551.00
Shataia Stallings	10.5	2025	\$235	\$2,467.50
Donna Storer	0.8	2025	\$230	\$184.00
Annagrace Norr	5.0	2025	\$210	\$1,050.00
Becca Morton	19.3	2025	\$190	\$3,667.00
Maureen Young	34.2	2025	\$190	\$6,498.00
Lindsey Underberg	4.1	2025	\$155	\$635.50
TOTAL	123.8			\$37,846.00

Blended Hourly Rate:	\$305.70
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(5007) Claims Administration and Objections: \$112.00

Services include communicating with the CRO regarding transfers of claim filings and communicating with creditors' counsel.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2025	\$635	\$63.50
Katherine A. Nixon	0.1	2025	\$485	\$48.50
TOTAL	0.2			\$112.00

Blended Hourly Rate:	\$560.00
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(5010) Employment and Fee Applications: \$1,485.00

Services include reviewing and revising application to employ tax accountant; drafting and revising Fredrikson's ninth fee application and CRO's ninth monthly staffing report.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.2	2025	\$635	\$127.00
Katherine A. Nixon	2.8	2025	\$485	\$1,358.00
TOTAL	3.0			\$1,485.00

Blended Hourly Rate:	\$495.00
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(5013) Meetings and Communications with Creditors: \$1,224.00

Services include communicating with various creditors and counsel for the official committee of unsecured creditors (the “Committee”).

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.4	2025	\$635	\$254.00
Katherine A. Nixon	2.0	2025	\$485	\$970.00
TOTAL	2.4			\$1,224.00

Blended Hourly Rate:	\$510.00
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(5015) Plan and Disclosure Statement: \$1,888.00

Services include meeting and communicating with the Committee regarding revisions to the plan; finalizing the plan and disclosure statement; reviewing the disclosure statement hearing order; analyzing confirmation hearing issues and support from Committee; strategizing regarding changes to the substantive consolidation motion; and analyzing trust agreement issues.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	2.3	2025	\$635	\$1,460.50
Katherine A. Nixon	0.3	2025	\$485	\$145.50
Shataia Stallings	1.2	2025	\$235	\$282.00
TOTAL	3.8			\$1,888.00

Blended Hourly Rate:	\$496.84
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(5018) Reporting: \$307.00

Services include finalizing April monthly operating reports and emailing bank records to the counsel for the United States Trustee.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.1	2025	\$485	\$48.50
Shataia Stallings	1.1	2025	\$235	\$258.50
TOTAL	1.2			\$307.00

Blended Hourly Rate:	\$255.00
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(0003) Adversary Proceeding Against Preference 42, LLC: \$388.00

Services include drafting discovery requests and expert disclosures for the defendant.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.8	2025	\$485	\$388.00
TOTAL	0.8			\$388.00

Blended Hourly Rate:	\$485.00
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(0004) Adversary Proceeding Against Boulevard Square II, LLC et al.: \$2,293.00

Services include reviewing discovery documents and drafting and sending discovery request and expert disclosures to the defendant.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	3.0	2025	\$635	\$1,905.00
Katherine A. Nixon	0.8	2025	\$485	\$388.00
TOTAL	3.8			\$2,293.00

Blended Hourly Rate:	\$603.42
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(0005) Adversary Proceeding Against Pioneer Place, LLC: \$10,637.50

Services include analyzing receivership motion and strategy; confirming response deadlines; drafting garnishment documents; coordinating sending writ of execution to Bravera Bank; drafting reply briefs; conducting document review for discovery; requesting new writs of execution; analyzing garnishment and judgment issues; and communicating with court clerks and creditors regarding hearings.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	7.0	2025	\$635	\$4,445.00
Michael S. Raum	0.4	2025	\$480	\$192.00
Katherine A. Nixon	9.7	2025	\$485	\$4,704.50
Leslie Anderson	3.6	2025	\$360	\$1,296.00
TOTAL	20.7			\$10,637.50

Blended Hourly Rate:	\$513.88
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(0006) Adversary Proceeding against SAD Downtown, LLC d/b/a The Firm: \$21,537.00

Services include extensive research and drafting of discovery requests, expert disclosures, summary judgment motion and its accompanying exhibits.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	33.0	2025	\$635	\$20,955.00
Katherine A. Nixon	1.2	2025	\$485	\$582.00
TOTAL	34.2			\$21,537.00

Blended Hourly Rate:	\$629.74
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(0007) Adversary Proceeding Against Greenfield Commons, LLC et al.: \$709.00

Services including analyzing hearing and notice issues; communicating with court staff regarding scheduling hearing on motion for default judgment; preparing for and attending hearing on motion for default judgment; and domesticating judgments in Burleigh County.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.2	2025	\$635	\$127.00
Katherine A. Nixon	1.2	2025	\$485	\$582.00
TOTAL	1.4			\$709.00

Blended Hourly Rate:	\$506.43
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(0008) Adversary Proceeding Against EPIC Holdings II, LLC: \$1,067.00

Services include communicating with defense counsel regarding suspension of certain deadlines; reviewing draft expert report; and researching insolvency under relevant case law.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	2.2	2025	\$485	\$1,067.00
TOTAL	2.2			\$1,067.00

Blended Hourly Rate:	\$485.00
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(0010) Adversary Proceeding Against LTC – The Don, LLC: \$593.50

Services include drafting and finalizing settlement agreement and emailing the CRO regarding same.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.4	2025	\$635	\$254.00
Katherine A. Nixon	0.7	2025	\$485	\$339.50
TOTAL	1.1			\$593.50

Blended Hourly Rate:	\$539.54
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(0011) Adversary Proceeding Against 36th and Veterans, LLC: \$1,016.00

Services include reviewing discovery requests and communicating with defense counsel regarding status conference, motions for default judgment, discovery, and settlement.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.6	2025	\$635	\$1,016.00
TOTAL	1.6			\$1,016.00

Blended Hourly Rate:	\$635.00
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(0012) Adversary Proceeding Against LTC – The Lincoln, LLC: \$339.50

Services include emailing defense counsel proposed dates for scheduling order and attending scheduling conference.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.7	2025	\$485	\$339.50
TOTAL	0.7			\$339.50

Blended Hourly Rate:	\$485.00
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(0013) Adversary Proceeding Against Pioneer Place Holdings, LLC: \$321.00

Services include analyzing service issue for default judgment motions and drafting declaration regarding service on defendant.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.2	2025	\$635	\$127.00
Katherine A. Nixon	0.4	2025	\$485	\$194.00
TOTAL	0.6			\$321.00

Blended Hourly Rate:	\$535.00
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(0015) Adversary Proceeding Against Area 57 Association, Inc.: \$242.50

Services include domesticating judgment in North Dakota state court and emailing CRO regarding domestication proceedings.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.5	2025	\$485	\$242.50
TOTAL	0.5			\$242.50

Blended Hourly Rate:	\$485.00
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(0016) Adversary Proceeding Against HI West Acres, LLC, f/k/a EPIC Hospitality, LLC: \$97.00

Services include drafting expert disclosures and sending to defense counsel.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.2	2025	\$485	\$97.00
TOTAL	2.7			\$97.00

Blended Hourly Rate:	\$485.00
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(0018) Adversary Proceeding Against EPIC Holdings, LLC: \$4,699.00

Services include drafting settlement agreements and communicating with CRO; reviewing and revising expert report; extensively communicating with defense counsel regarding settlement agreement.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	7.4	2025	\$635	\$4,699.00
TOTAL	7.4			\$4,699.00

Blended Hourly Rate:	\$635.00
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(0019) Adversary Proceeding Against Fargo South Hospitality, LLC: \$485.00

Services include emailing CRO regarding filing of defendant's jury trial brief and drafting discovery requests to defendant.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	1.0	2025	\$485	\$485.00
TOTAL	1.0			\$485.00

Blended Hourly Rate:	\$485.00
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(0020) Adversary Proceeding Against BA Downtown, LLC: \$339.50

Services include drafting declaration regarding service on defendant, domesticating judgment, and arranging for garnishment check.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.7	2025	\$485	\$339.50
TOTAL	0.7			\$339.50

Blended Hourly Rate:	\$485.00
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(0022) Adversary Proceeding Against EPIC Place, LLC: \$414.50

Services include communicating with defense counsel regarding mail service; reviewing purchase agreement; withdrawing motion for default judgment; and preparing for and participating in scheduling conference.

<u>Name</u>	<u>Hours</u>	<u>Year</u>		<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.5	2025		\$635	\$317.50
Katherine A. Nixon	0.2	2025		\$485	\$97.00
TOTAL	0.7				\$414.50

Blended Hourly Rate:	\$592.14
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(0023) Adversary Proceeding Against The Tracks – Maverick, LLC: \$242.50

Services include drafting discovery requests to defendant.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.5	2025	\$485	\$242.50
TOTAL	0.5			\$242.50

Blended Hourly Rate:	\$485.00
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(0024) Adversary Proceeding Against CBE, LLC: \$485.00

Services include drafting declaration regarding service on defendant, domesticating judgment, arranging for garnishment check.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	1.0	2025	\$485	\$485.00
TOTAL	1.0			\$485.00

Blended Hourly Rate:	\$485.00
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(0025) Adversary Proceeding Against EOLA Landholdings, LLC: \$339.50

Services include drafting declaration regarding service on defendant, domesticating judgment, and arranging for garnishment check.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.7	2025	\$485	\$339.50
TOTAL	0.7			\$339.50

Blended Hourly Rate:	\$485.00
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(0026) Adversary Proceeding Against Dutch Mill Development LLC: \$145.50

Services include drafting and finalizing motion for default judgment and communicating with CRO regarding copy of motion filed with the Court.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.3	2025	\$485	\$145.50
TOTAL	0.3			\$145.50

Blended Hourly Rate:	\$485.00
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(0027) Adversary Proceeding Against Northern Mall Partners, LLC: \$530.00

Services include reviewing the order approving the settlement; extensively communicating with defense counsel regarding the settlement payment; drafting and finalizing the notice of voluntary dismissal with prejudice; and communicating with defense counsel regarding these matters.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.3	2025	\$635	\$190.50
Katherine A. Nixon	0.7	2025	\$485	\$339.50
TOTAL	1.0			\$530.00

Blended Hourly Rate:	\$530.00
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(0028) Adversary Proceeding Against West Fargo Dive Bar, LLC: \$1,591.00

Services include reviewing answer to complaint; communicating with court staff regarding status for motion for default judgment; reviewing objection to motion for default judgment; preparing for and participating in hearing on motion for default judgment; communicating with CRO regarding Court's ruling on motion for default judgment.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	2.2	2025	\$635	\$1,397.00
Katherine A. Nixon	0.4	2025	\$485	\$194.00
TOTAL	2.6			\$1,591.00

Blended Hourly Rate:	\$611.92
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(0029) Adversary Proceeding Against Makt, LLC: \$145.50

Services include domesticating judgment in North Dakota state court and arranging for garnishment check.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.3	2025	\$485	\$145.50
TOTAL	0.3			\$145.50

Blended Hourly Rate:	\$485.00
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TOTAL POSTPETITION FEES: \$91,520.00

11. **Reimbursement of Expenses.** In the course of this representation, Fredrikson has also incurred expenses detailed as part of Matter Nos. 5000,² 0005, and 0013 on **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>	<u>Amount</u>
Mediator Fees	\$4,000
Garnishment Check Fees	\$360.00
Certified Copies of Judgments	\$63.50
Writ of Execution – Filing Fees	\$10.00

² The invoice for Matter No. 5000 includes garnishment filing fees of \$15.00, issued on May 29, 2025, totaling \$105.00. Fredrikson waives these fees and requests reimbursement solely for the amount of \$5,299.17 for Matter No. 5000.

<u>Expenses</u>	<u>Amount</u>
North Dakota State Court – Filing Fees	\$60.00
Postage Charges	\$865.67
TOTAL	\$5,359.17

TOTAL EXPENSES: \$5,359.17

12. All services for which fees are requested by Fredrikson were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

13. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fredrikson, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fredrikson has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

WHEREFORE, Fredrikson respectfully requests that the Court enter an order:

A. Allowing Fredrikson's fees incurred between May 1, 2025 and May 31, 2025 in the amount of **\$91,520.00**, and expenses in the amount of **\$5,359.17**, totaling **\$96,879.17**;

B. Authorizing the Debtors to pay Fredrikson such allowed postpetition fees and expenses;

C. Granting administrative expense priority to Fredrikson's allowed fees and expenses; and

D. Granting such other and further relief as may be just and proper.

Dated: June 24, 2025

/e/ Steven R. Kinsella

Michael S. Raum (#05676)

FREDRIKSON & BYRON, P.A.

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Fargo, ND 58102-4991

701.237.8200

mraum@fredlaw.com

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

FREDRIKSON & BYRON, P.A.

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612.492.7000

skinsella@fredlaw.com

knixon@fredlaw.com

ATTORNEYS FOR DEBTORS

AFFIDAVIT

I, Steven R. Kinsella, an attorney at the law firm of Fredrikson & Byron, P.A., declare under penalty of perjury that the foregoing Tenth Application of Fredrikson & Byron, P.A. for Allowance of Fees and Expenses as Chapter 11 Counsel for the Debtors from May 1, 2025 Through May 31, 2025 is true and correct according to the best of my knowledge, information, and belief.

Dated: June 24, 2025

/s/ Steven R. Kinsella
Steven R. Kinsella

EXHIBIT A

CourtAlert® Case Management

From: ecf@ndb.uscourts.gov
Sent: 7/25/2024 12:56:27 PM
To: nate_olson@ndb.uscourts.gov
Subject: Ch-11 24-30281 EPIC Companies Midwest, LLC Order on Application to Employ

CAUTION: EXTERNAL E-MAIL

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

U.S. Bankruptcy Court

District of North Dakota

Notice of Electronic Filing

The following transaction was received from vck, Court entered on 7/25/2024 at 12:56 PM CDT and filed on 7/25/2024

Case Name: EPIC Companies Midwest, LLC

Case Number: [24-30281](#)

Document Number: [49](#)

Docket Text:

Order Approving Application to Employ Steven R. Kinsella and Fredrikson & Byron, P.A. as counsel for Debtor EPIC Companies Midwest, LLC effective July 8, 2024 (Related Doc. [13]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. 329, 330. Applicant must also comply with Local Rules. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings (Text order only). Signed on 7/25/2024 (vck)

The following document(s) are associated with this transaction:

24-30281 Notice will be electronically mailed to:

Douglas Christensen on behalf of Creditor Beth Holmes
dougc@grandforkslaw.com,
sarah@grandforkslaw.com;jen@grandforkslaw.com;julie@grandforkslaw.com

Michael Gust on behalf of Interested Party Bank Forward
mlgfilings@andersonbottrell.com, jernst@abstlaw.net

Joseph D Hackman on behalf of Interested Party Bank Forward
jhackman@abstlaw.net

Peter B. Hankla on behalf of Interested Party Randy and Dorothy Henke
phankla@mcgeelaw.com

Steven R Kinsella on behalf of Debtor EC West Fargo, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EOLA Capital, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest 2023, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Employee, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

John M Krings, Jr. on behalf of Creditor Cornerstone Bank
john@kaler-doeling.com, janae@kaler-doeling.com

Katherine A. Nixon on behalf of Debtor EPIC Companies Midwest, LLC
knixon@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Richard P. Olson on behalf of Creditor Essential Living Inc
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Richard P. Olson on behalf of Creditor Bruce & Diane Walker
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Robert B. Raschke
USTPRegion12.SX.ECF@usdoj.gov

Michael S Raum on behalf of Debtor EPIC Companies Midwest, LLC
mraum@fredlaw.com, mraum@fredlaw.com;dtaylor@fredlaw.com

Katrina A. Turman Lang on behalf of Creditor Dietz Properties, LLC
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Candice Dietz
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Larry Dietz
klang@woldlaw.com, melanie@turmanlaw.com

Sarah J. Wencil on behalf of U.S. Trustee Robert B. Raschke
sarah.j.wencil@usdoj.gov

Benjamin Williams on behalf of Creditor Cullen Insulation, Inc.
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

Benjamin Williams on behalf of Creditor Daniel Frisch
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

24-30281 Notice will not be electronically mailed to:

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

IT IS ORDERED that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

IT IS FURTHER ORDERED that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

IT IS FURTHER ORDERED that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

IT IS FURTHER ORDERED that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE
UNITED STATES BANKRUPTCY COURT

EXHIBIT C

Fredrikson

Invoice: 1934545
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5001

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Asset Analysis and Recovery

Total for Current Legal Fees:	\$ 38,463.00
Less Adjustment for No Charge Items:	\$ (617.00)
Total For Current Invoice:	\$ 37,846.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

[REDACTED]
Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Please send remittance information to paynotification@fredlaw.com

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934545
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927577	20,856.00		20,856.00
Total Prior Balance:				\$ 20,856.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934545
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5001

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/25	K. Nixon	Attention to discovery tags and search terms and working on Disco.	1.40	679.00
05/05/25	S. Kinsella	Meeting with CRO (.9); review documents for document production (1.7).	2.60	1,651.00
05/05/25	K. Nixon	Attend meeting with CRO regarding asset analysis (1.0); strategize re: review of discovery (0.5); emails to G. Singer re: discovery requests and mediation (0.4); attention to discovery tags and search terms and working on Disco (0.4).	2.30	1,115.50
05/05/25	D. Storer	Manage correspondence related to the document review project, including status updates, coordination with team members, and follow-up on outstanding items.	0.10	23.00
05/06/25	S. Stallings	Attention to document production and prepare data room with tags to identify certain documents for production.	1.00	235.00
05/06/25	K. Nixon	Phone call with CRO re: discovery strategy.	0.30	145.50
05/07/25	K. Nixon	Meeting with Disco and CRO to discuss discovery tools (0.6); strategize re: review of discovery, including meeting with paralegal manager (0.8); phone call with CRO re: discovery strategy (0.3); attention to answers filed in adversary proceedings with pending default judgment motions (0.2); attention to misc. notices of returned mail (0.3).	2.20	1,067.00
05/08/25	K. Nixon	Manage and conduct document review for purposes of discovery (2.7); meeting with document review team re: review protocols and follow-up email re: the same (0.9).	3.60	1,746.00
05/08/25	M. Young	Discuss details of document review project. (No Charge)	0.50	95.00



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05/08/25	L. Underberg	Attend EPIC - Doc Review Project initial meeting with K. Nixon and paralegal case team. (No Charge)	0.60	93.00
05/08/25	S. Stallings	Prepare for and participate in meeting regarding document review for adversary proceedings. (No Charge)	0.60	141.00
05/08/25	E. Prisby	Attend Teams meeting with K. Nixon and paralegals regarding upcoming document review. (No Charge)	0.50	132.50
05/08/25	K. Alstad	EPIC - Doc Review Project meeting. (No Charge)	0.50	132.50
05/08/25	D. Storer	Review correspondence regarding document review project. (No Charge)	0.10	23.00
05/09/25	K. Nixon	Manage document review for purposes of discovery (0.4); review and analyze status of open adversary proceedings and assess next steps (0.3).	0.70	339.50
05/12/25	S. Kinsella	Meeting with CRO regarding lending adversary proceedings and settlement negotiations.	0.80	508.00
05/12/25	A. Norr	Conduct document review for purposes of discovery.	2.00	420.00
05/12/25	K. Nixon	Attend meeting with CRO regarding asset analysis (0.7); manage document review for purposes of discovery (0.1).	0.80	388.00
05/12/25	S. Stallings	Conduct document review for purposes of discovery	0.20	47.00
05/13/25	M. Young	Conduct document review for purposes of discovery.	1.30	247.00
05/13/25	D. Storer	Review correspondence regarding document review project.	0.10	23.00
05/13/25	K. Nixon	Manage and conduct document review for purposes of discovery.	1.80	873.00
05/13/25	K. Alstad	Conduct document review for purposes of discovery.	1.30	344.50
05/13/25	S. Stallings	Conduct document review for purposes of discovery.	0.60	141.00
05/14/25	M. Young	Conduct document review for purposes of discovery.	5.00	950.00
05/14/25	A. Norr	Conduct document review for purposes of discovery.	2.00	420.00
05/14/25	D. Storer	Review correspondence regarding document review project.	0.10	23.00



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05/14/25	K. Alstad	Conduct document review for purposes of discovery.	1.40	371.00
05/14/25	S. Stallings	Conduct document review for purposes of discovery.	1.90	446.50
05/14/25	B. Morton	Conduct document review for purposes of discovery.	0.50	95.00
05/14/25	K. Nixon	Meeting with conflicts counsel and CRO re: streamlining discovery (0.5) ; manage and conduct document review for purposes of discovery (1.3).	1.80	873.00
05/15/25	M. Young	Conduct document review for purposes of discovery.	5.00	950.00
05/15/25	A. Norr	Conduct document review for purposes of discovery.	1.00	210.00
05/15/25	D. Storer	Review correspondence regarding document review project.	0.10	23.00
05/15/25	B. Morton	Conduct document review for purposes of discovery.	1.90	361.00
05/15/25	K. Alstad	Conduct document review for purposes of discovery.	2.40	636.00
05/16/25	S. Stallings	Conduct document review for purposes of discovery.	1.00	235.00
05/16/25	K. Nixon	Review and analyze status of open adversary proceedings and assess next steps.	0.20	97.00
05/16/25	B. Morton	Conduct document review for purposes of discovery.	1.70	323.00
05/18/25	S. Stallings	Conduct document review for purposes of discovery.	2.30	540.50
05/19/25	M. Young	Conduct document review for purposes of discovery.	4.60	874.00
05/19/25	D. Storer	Review correspondence regarding document review project.	0.10	23.00
05/19/25	L. Underberg	Conduct document review for purposes of discovery.	0.40	62.00
05/19/25	K. Alstad	Conduct document review for purposes of discovery.	1.80	477.00
05/19/25	K. Nixon	Attend meeting with CRO regarding asset analysis (1.5); manage document review for purposes of discovery (0.4).	2.90	1,406.50



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05/19/25	S. Kinsella	Meeting with CRO regarding adversary proceedings (1.6); phone call with CRO regarding expert reports (.5); prepare discovery strategy for multiple adversary proceedings (.7); coordinate garnishment and writ execution (.3).	3.10	1,968.50
05/19/25	B. Morton	Conduct document review for purposes of discovery.	3.90	741.00
05/20/25	S. Stallings	Conduct document review for purposes of discovery.	0.60	141.00
05/20/25	M. Young	Conduct document review for purposes of discovery.	4.50	855.00
05/20/25	K. Alstad	Conduct document review for purposes of discovery.	1.50	397.50
05/20/25	K. Nixon	Manage document review for purposes of discovery.	0.60	291.00
05/20/25	L. Underberg	Conduct document review for purposes of discovery.	0.60	93.00
05/20/25	B. Morton	Conduct document review for purposes of discovery.	2.10	399.00
05/21/25	S. Stallings	Conduct document review for purposes of discovery.	2.20	517.00
05/21/25	K. Nixon	Manage document review for purposes of discovery.	0.10	48.50
05/21/25	K. Alstad	Confer regarding document review. Conduct document review for purposes of discovery.	2.60	689.00
05/21/25	M. Young	Conduct document review for purposes of discovery.	5.50	1,045.00
05/21/25	L. Underberg	Conduct document review for purposes of discovery.	0.40	62.00
05/21/25	B. Morton	Conduct document review for purposes of discovery.	2.00	380.00
05/21/25	D. Storer	Review correspondence regarding document review project.	0.10	23.00
05/22/25	K. Alstad	Conduct document review for purposes of discovery.	0.80	212.00
05/22/25	B. Morton	Conduct document review for purposes of discovery.	1.90	361.00
05/22/25	S. Kinsella	Phone call with secured lender for project borrower.	0.40	254.00
05/22/25	M. Young	Conduct document review for purposes of discovery.	2.00	380.00



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05/22/25	L. Underberg	Conduct document review for purposes of discovery.	2.60	403.00
05/23/25	S. Kinsella	Communications with counsel regarding project borrower settlement.	0.10	63.50
05/23/25	B. Morton	Conduct document review for purposes of discovery.	5.00	950.00
05/27/25	K. Alstad	Conduct document review for purposes of discovery.	1.60	424.00
05/27/25	S. Kinsella	Meeting with CRO regarding status of pending adversary proceedings and settlements (1.1); review discovery requests from multiple defendants and analyze breadth of document production (2.9).	4.00	2,540.00
05/27/25	B. Morton	Conduct document review for purposes of discovery.	0.30	57.00
05/27/25	M. Young	Conduct document review for purposes of discovery.	5.50	1,045.00
05/27/25	K. Nixon	Attend meeting with CRO regarding asset analysis.	1.20	582.00
05/27/25	D. Storer	Review correspondence regarding document review project.	0.10	23.00
05/28/25	S. Kinsella	Meeting with CRO regarding discovery requests in six of the adversary proceedings (1.2); review discovery requests and begin preparing responses (.9).	2.10	1,333.50
05/28/25	J. Brand	Discussion regarding discovery emails.	0.10	69.00
05/28/25	K. Nixon	Research foreclosure actions against certain borrowers (0.2); meeting with CRO re: discovery issues (1.0).	1.20	582.00
05/28/25	L. Underberg	Review email from S. Stallings regarding the 36th and Veterans case settlement.	0.10	15.50
05/28/25	M. Young	Conduct document review for purposes of discovery.	0.80	152.00
05/28/25	D. Storer	Review correspondence regarding document review project.	0.10	23.00
05/29/25	S. Stallings	Conduct document review for purposes of discovery.	0.30	70.50
05/29/25	S. Kinsella	Analyze discovery requests.	0.20	127.00
05/30/25	S. Stallings	Conduct document review for purposes of discovery.	0.40	94.00



Invoice: 1934545
 Invoice Date: June 3, 2025
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05/30/25	K. Nixon	Review status of all garnishments to date and evaluate next steps.	1.50	727.50
05/30/25	S. Kinsella	Analyze affirmative defense issue.	0.50	317.50
Current Legal Fees:			126.60	\$ 38,463.00
Less Adjustment for No Charge Items:				(617.00)
Current Legal Fees After Adjustments:				\$ 37,846.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
James C. Brand	690.00	0.10	69.00
Steven R. Kinsella	635.00	13.80	8,763.00
Katherine Nixon	485.00	22.60	10,961.00
Kari Alstad	265.00	13.40	3,551.00
Kari Alstad	0.00	0.50	0.00
Shataia Stallings	235.00	10.50	2,467.50
Shataia Stallings	0.00	0.60	0.00
Donna R. Storer	230.00	0.80	184.00
Donna R. Storer	0.00	0.10	0.00
Annagrace Norr	210.00	5.00	1,050.00
Becca Morton	190.00	19.30	3,667.00
Maureen Young	190.00	34.20	6,498.00
Maureen Young	0.00	0.50	0.00
Lindsey Underberg	155.00	4.10	635.50
Lindsey Underberg	0.00	0.60	0.00
Elizabeth Prisby	0.00	0.50	0.00
Total		126.60	\$ 37,846.00

Invoice Totals

Total for Current Legal Fees:	\$ 38,463.00
Less Adjustment for No Charge Items:	\$ (617.00)
Total For Current Invoice:	\$ 37,846.00

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Regarding: Claims Administration and Objections

Total for Current Legal Fees: \$ 112.00

Total For Current Invoice: **\$ 112.00**

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934469
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/09/25	K. Nixon	Email CRO re: filing of claim transfers.	0.10	48.50
05/21/25	S. Kinsella	Communications with counsel for creditor.	0.10	63.50
Current Legal Fees:			0.20	\$ 112.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.10	63.50
Katherine Nixon	485.00	0.10	48.50
Total		0.20	\$ 112.00

Invoice Totals

Total for Current Legal Fees: \$ 112.00

Total For Current Invoice: \$ 112.00



Invoice: 1934470
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Employment and Fee Applications

Total for Current Legal Fees: \$ 1,485.00

Total For Current Invoice: \$ 1,485.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Invoice: 1934470
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927579	2,608.50		2,608.50
Total Prior Balance:				\$ 2,608.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934470
 Invoice Date: June 3, 2025
 Client Number: 097807
 Matter Number: 097807.5010

EPIC Companies Midwest, LLC
 Attn: Patrick Finn
 900 Long Lake Rd, Suite 180
 Lighthouse Management Group, Inc.
 New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/25	K. Nixon	Email client re: approval of misc. fee applications (0.1); revise application to employ tax accountant (0.4).	0.50	242.50
05/01/25	S. Kinsella	Finalize accountant employment application.	0.10	63.50
05/02/25	K. Nixon	Coordinate signatures and filing of application to employ tax accountant.	0.10	48.50
05/05/25	K. Nixon	Email CRO re: file-stamped copy of application to employ tax accountant.	0.10	48.50
05/11/25	K. Nixon	Draft Fredrikson's ninth fee application.	1.70	824.50
05/11/25	K. Nixon	Draft CRO's ninth monthly staffing report and send to CRO for review.	0.10	48.50
05/12/25	S. Kinsella	Review and revise fee applications.	0.10	63.50
05/12/25	K. Nixon	Finalize Fredrikson's ninth fee application.	0.10	48.50
05/16/25	K. Nixon	Email CRO re: filed copy of April monthly staffing report.	0.10	48.50
05/27/25	K. Nixon	Email CRO re: order approving employment of Creative Planning.	0.10	48.50
Current Legal Fees:			3.00	\$ 1,485.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.20	127.00
Katherine Nixon	485.00	2.80	1,358.00
Total		3.00	\$ 1,485.00



Invoice: 1934470
Invoice Date: June 3, 2025
Page: 2

Invoice Totals

Total for Current Legal Fees:	\$ 1,485.00
Total For Current Invoice:	\$ 1,485.00

Fredrikson

Invoice: 1934471
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Meetings and Communications with Creditors

Total for Current Legal Fees: \$ 1,224.00

Total For Current Invoice: \$ 1,224.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934471
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927580	366.00		366.00
Total Prior Balance:				\$ 366.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934471
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/08/25	K. Nixon	Return phone calls to counsel for misc. creditors re: plan and ballots.	0.30	145.50
05/12/25	S. Kinsella	Communications with claims buyer.	0.10	63.50
05/12/25	K. Nixon	Return phone call to creditor re: receipt of disclosure statement notice of hearing (0.2); respond to email from creditor re: voting on plan (0.2).	0.40	194.00
05/13/25	K. Nixon	Phone call with creditor re: request for copy of disclosure statement.	0.10	48.50
05/15/25	K. Nixon	Meeting with Hain Capital re: plan and status of case.	0.60	291.00
05/16/25	S. Kinsella	Communications with claims buyer.	0.10	63.50
05/19/25	K. Nixon	Return phone calls and emails to creditors re: disclosure statement.	0.40	194.00
05/20/25	K. Nixon	Respond to email from attorney for investor.	0.10	48.50
05/27/25	K. Nixon	Return phone call to creditor.	0.10	48.50
05/30/25	S. Kinsella	Phone call with claims buyer.	0.20	127.00
Current Legal Fees:			2.40	\$ 1,224.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.40	254.00
Katherine Nixon	485.00	2.00	970.00
Total		2.40	\$ 1,224.00



Invoice: 1934471
Invoice Date: June 3, 2025
Page: 2

Invoice Totals

Total for Current Legal Fees:	\$ 1,224.00
Total For Current Invoice:	\$ 1,224.00



Invoice: 1934546
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5015

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Plan and Disclosure Statement

Total for Current Legal Fees: \$ 1,888.00

Total For Current Invoice: \$ 1,888.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934546
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927581	18,993.00		18,993.00
Total Prior Balance:				\$ 18,993.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934546
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5015

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/25	S. Kinsella	Communications with UST and Committee counsel regarding the plan.	0.10	63.50
05/02/25	S. Kinsella	Revise plan and disclosure statement.	0.30	190.50
05/05/25	S. Kinsella	Finalize drafts of plan, disclosure statement, and exhibits.	0.50	317.50
05/05/25	K. Nixon	Email CRO re: file-stamped copy of plan and disclosure statement.	0.10	48.50
05/05/25	S. Stallings	Finalize exhibits and plan and disclosure statement for EPIC and e-file with court (.4); attention to creditor matrix and make arrangements of service for notice of hearing (.6).	1.20	282.00
05/06/25	S. Kinsella	Review disclosure statement hearing order.	0.10	63.50
05/07/25	S. Kinsella	Analyze confirmation issues and Committee support.	0.50	317.50
05/12/25	K. Nixon	Strategize re: timing of filing substantive consolidation motion (0.1); review certificate of service for disclosure statement hearing notice (0.1).	0.20	97.00
05/12/25	S. Kinsella	Communications with creditors regarding disclosure statement.	0.20	127.00
05/15/25	S. Kinsella	Communications with creditor regarding plan and disclosure statement.	0.10	63.50
05/16/25	S. Kinsella	Analyze trust agreement issues and communications with Committee counsel regarding the same.	0.30	190.50
05/27/25	S. Kinsella	Review proposed edits to trust agreement.	0.20	127.00
Current Legal Fees:			3.80	\$ 1,888.00



Invoice: 1934546
Invoice Date: June 3, 2025
Page: 2

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	2.30	1,460.50
Katherine Nixon	485.00	0.30	145.50
Shataia Stallings	235.00	1.20	282.00
Total		3.80	\$ 1,888.00

Invoice Totals

Total for Current Legal Fees:	\$ 1,888.00
Total For Current Invoice:	\$ 1,888.00

Fredrikson

Invoice: 1934472
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Reporting

Total for Current Legal Fees: \$ 307.00

Total For Current Invoice: \$ 307.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

[REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934472
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927582	164.50		164.50
Total Prior Balance:				\$ 164.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934472
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.5018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/20/25	S. Stallings	Finalize April monthly operating reports for all debtors and e-file and submit bank statements to UST.	0.60	141.00
05/20/25	K. Nixon	Email CRO re: filed copies of April MORs.	0.10	48.50
05/28/25	S. Stallings	Updates to creditor matrix and returned mail in adversary cases and main case.	0.50	117.50
Current Legal Fees:			1.20	\$ 307.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	0.10	48.50
Shataia Stallings	235.00	1.10	258.50
Total		1.20	\$ 307.00

Invoice Totals

Total for Current Legal Fees:	\$ 307.00
Total For Current Invoice:	\$ 307.00

Fredrikson

Invoice: 1934449
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0003

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary action against Preference 42, LLC

Total for Current Legal Fees: \$ 388.00

Total For Current Invoice: \$ 388.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934449
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927554	190.50		190.50
Total Prior Balance:				\$ 190.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934449
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0003

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/25	K. Nixon	Draft discovery requests to Defendant.	0.60	291.00
05/15/25	K. Nixon	Draft expert disclosures and send to defense counsel.	0.20	97.00
Current Legal Fees:			0.80	\$ 388.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	0.80	388.00
Total		0.80	\$ 388.00

Invoice Totals

Total for Current Legal Fees: \$ 388.00

Total For Current Invoice: \$ 388.00



Invoice: 1934450
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0004

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against Boulevard Square

Total for Current Legal Fees: \$ 2,293.00

Total For Current Invoice: \$ 2,293.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Invoice: 1934450
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927555	2,938.50		2,938.50
Total Prior Balance:				\$ 2,938.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934450
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0004

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/25	S. Kinsella	Review discovery documents.	0.50	317.50
05/02/25	K. Nixon	Draft discovery requests to Defendant.	0.40	194.00
05/06/25	K. Nixon	Draft discovery requests to Defendant.	0.20	97.00
05/07/25	S. Kinsella	Review documents and prepare discovery requests.	1.20	762.00
05/08/25	S. Kinsella	Review documents (.6); assist with preparing instruction regarding search terms, batching, and document review process to document review team (.7).	1.30	825.50
05/15/25	K. Nixon	Draft expert disclosures and send to defense counsel.	0.20	97.00
Current Legal Fees:			3.80	\$ 2,293.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	3.00	1,905.00
Katherine Nixon	485.00	0.80	388.00
Total		3.80	\$ 2,293.00

Invoice Totals

Total for Current Legal Fees: \$ 2,293.00

Total For Current Invoice: \$ 2,293.00

Fredrikson

Invoice: 1934547
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0005

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against Pioneer Place, LLC

Total for Current Legal Fees:	\$ 10,637.50
Total For Current Costs and Other Charges:	\$ 50.00
Total For Current Invoice:	\$ 10,687.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

For remittance information to paynotification@fredlaw.com

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Invoice: 1934547
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927556	8,264.07		8,264.07
Total Prior Balance:				\$ 8,264.07

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934547
 Invoice Date: June 3, 2025
 Client Number: 097807
 Matter Number: 097807.0005

EPIC Companies Midwest, LLC
 Attn: Patrick Finn
 900 Long Lake Rd, Suite 180
 Lighthouse Management Group, Inc.
 New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/25	S. Kinsella	Multiple phone calls with opposing counsel (.6); phone call with CRO (.3); analyze deadlines and hearing strategy (.2).	1.10	698.50
05/02/25	K. Nixon	Phone call and email to Cass County Sheriff's Office re: writ of execution.	0.30	145.50
05/05/25	S. Kinsella	Analyze receivership motion and strategy.	0.40	254.00
05/05/25	M. Raum	Analyze receivership proceeding and strategy.	0.20	96.00
05/06/25	S. Kinsella	Analyze notice issue.	0.20	127.00
05/06/25	K. Nixon	Coordinate requesting certified copy of writ and obtaining additional garnishment check (0.2); draft letter to Bravera Bank re: writs of execution (0.4).	0.60	291.00
05/06/25	M. Raum	Call with S. Kinsella to discuss receivership strategy.	0.20	96.00
05/07/25	S. Kinsella	Analyze garnishment notice issue and prepare for receivership hearing.	0.30	190.50
05/07/25	K. Nixon	Coordinate sending writ of execution to Bravera Bank.	0.10	48.50
05/08/25	L. Anderson	Strategize with atty. K. Nixon regarding discovery issues and document review.	0.50	180.00
05/08/25	K. Nixon	Confirm deadline to respond to receivership motion and respond to CRO email re: the same (0.1); draft garnishment documents (0.6).	0.70	339.50
05/08/25	S. Kinsella	Review objections to receivership motion.	0.50	317.50
05/09/25	S. Kinsella	Review and analyze receivership objections (.9); review corresponding documents (.5); prepare outline of arguments (.3).	1.70	1,079.50
05/09/25	K. Nixon	Confirm deadline for filing reply to objection to motion.	0.10	48.50
05/12/25	S. Kinsella	Draft reply brief in receivership case.	0.50	317.50



Invoice:
Invoice Date:
Page:

1934547
June 3, 2025
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05/12/25	K. Nixon	Review response briefs to receivership motion and strategize re: filing of reply.	0.60	291.00
05/13/25	L. Anderson	Conduct document review for purposes of discovery.	2.90	1,044.00
05/13/25	K. Nixon	Strategize re: contents of reply to opposition to receivership motion.	0.10	48.50
05/13/25	S. Kinsella	Prepare reply.	0.30	190.50
05/14/25	K. Nixon	Draft reply in support of motion to appoint receiver.	2.40	1,164.00
05/15/25	S. Kinsella	Revise reply in receivership proceeding.	0.60	381.00
05/15/25	K. Nixon	Revise and finalize reply in support of motion to appoint receiver.	1.60	776.00
05/16/25	K. Nixon	Attention to state court's orders denying Zoom request and requiring personal service on creditors, including emails to CRO, court staff, and opposing counsel.	0.70	339.50
05/16/25	S. Kinsella	Review court orders in receivership proceeding (.2); analyze notice requirements (.2); prepare strategy for hearing and new notices (.3).	0.70	444.50
05/17/25	S. Kinsella	Receive and review most recent garnishment notice.	0.10	63.50
05/19/25	K. Nixon	Confirm process for return of writ of execution and new request for the same (0.6); emails with court staff re: rescheduling of hearing (0.2).	0.80	388.00
05/20/25	K. Nixon	Emails to court staff, defense counsel, and proposed receiver re: rescheduling of hearing (0.3); draft notice of continued hearing (0.2).	0.50	242.50
05/20/25	S. Kinsella	Communications with court and creditors regarding receivership hearing.	0.10	63.50
05/21/25	K. Nixon	Attention to new writ of execution and notice of continued hearing.	0.60	291.00
05/21/25	S. Kinsella	Finalize and coordinate notice of new hearing for receivership case.	0.30	190.50
05/21/25	L. Anderson	Team meeting regarding document review status and issues.	0.20	72.00
05/28/25	K. Nixon	Request new writ of execution.	0.30	145.50
05/29/25	S. Kinsella	Analyze garnishment and judgment issues.	0.20	127.00
05/30/25	K. Nixon	Draft fourth round of garnishment documents.	0.30	145.50
Current Legal Fees:			20.70	\$ 10,637.50

Fredrikson

Invoice: 1934547
Invoice Date: June 3, 2025
Page: 3

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	7.00	4,445.00
Katherine Nixon	485.00	9.70	4,704.50
Michael S. Raum	480.00	0.40	192.00
Leslie Anderson	360.00	3.60	1,296.00
Total		20.70	\$ 10,637.50

Costs and Other Charges

	<u>Amount</u>
05/21/25 US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo Barr-Muscha 051525 - North Dakota Court System	10.00
05/21/25 Filing fee US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo Barr-Muscha 051525 - North Dakota Court System	10.00
05/21/25 US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo Barr-Muscha 051525 - ND Odyssey - Filing of Motion for Appointment of Receiver	30.00

Current Costs and Other Charges: \$ 50.00

Invoice Totals

Total for Current Legal Fees: \$ 10,637.50

Total For Current Costs and Other Charges: \$ 50.00

Total For Current Invoice: \$ 10,687.50



Invoice: 1934548
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0006

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against SAD Downtown, LLC d/b/a The Firm

Total for Current Legal Fees: \$ 21,537.00

Total For Current Invoice: \$ 21,537.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

[REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934548
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0006

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/25	K. Nixon	Draft discovery requests to Defendant.	1.00	485.00
05/15/25	K. Nixon	Draft expert disclosures and send to defense counsel.	0.20	97.00
05/15/25	S. Kinsella	Phone call with CRO regarding expert report (.3); coordinate expert disclosures (.3).	0.60	381.00
05/19/25	S. Kinsella	Draft summary judgment motion and review related exhibits.	2.50	1,587.50
05/20/25	S. Kinsella	Draft summary judgment motion and review supporting exhibits.	4.70	2,984.50
05/21/25	S. Kinsella	Research and draft summary judgment motion.	3.60	2,286.00
05/22/25	S. Kinsella	Continue to draft summary judgment motion and review documents for exhibits.	6.00	3,810.00
05/23/25	S. Kinsella	Continue to research and draft summary judgment motion.	4.40	2,794.00
05/27/25	S. Kinsella	Continue to research and draft summary judgment motion.	2.40	1,524.00
05/28/25	S. Kinsella	Continue to research and draft summary judgment motion.	2.60	1,651.00
05/29/25	S. Kinsella	Revise summary judgment motion.	2.50	1,587.50
05/30/25	S. Kinsella	Meeting with CRO regarding summary judgment motion (1.2) revise the same (2.5).	3.70	2,349.50
Current Legal Fees:			34.20	\$ 21,537.00



Invoice: 1934548
Invoice Date: June 3, 2025
Page: 2

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	33.00	20,955.00
Katherine Nixon	485.00	1.20	582.00
Total		34.20	\$ 21,537.00

Invoice Totals

Total for Current Legal Fees:	\$ 21,537.00
Total For Current Invoice:	\$ 21,537.00



Invoice: 1934451
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against Greenfield Commons

Total for Current Legal Fees: \$ 709.00

Total For Current Invoice: \$ 709.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934451
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927557	388.00		388.00
Total Prior Balance:				\$ 388.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934451
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/25	S. Kinsella	Analyze hearing and notice issue.	0.10	63.50
05/01/25	K. Nixon	Attention to email from court staff re: scheduling of hearing on motion for default judgment.	0.10	48.50
05/05/25	K. Nixon	Attend status conference on motion for default judgment.	0.20	97.00
05/08/25	S. Kinsella	Review judgment domestication documents.	0.10	63.50
05/08/25	K. Nixon	Domesticate judgments against Greenfield entities in Burleigh County.	0.40	194.00
05/28/25	K. Nixon	Determine relevant banking institutions and coordinate obtaining checks for garnishment.	0.50	242.50
Current Legal Fees:			1.40	\$ 709.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.20	127.00
Katherine Nixon	485.00	1.20	582.00
Total		1.40	\$ 709.00

Invoice Totals

Total for Current Legal Fees: \$ 709.00

Total For Current Invoice: \$ 709.00

Fredrikson

Invoice: 1934452
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0008

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against EPIC Holdings II

Total for Current Legal Fees: \$ 1,067.00

Total For Current Invoice: \$ 1,067.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934452
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927558	1,090.00		1,090.00
Total Prior Balance:				\$ 1,090.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934452
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0008

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/12/25	K. Nixon	Phone call with defense counsel re: suspension of certain deadlines and follow-up email to CRO re: the same.	0.20	97.00
05/13/25	K. Nixon	Review draft expert report.	1.20	582.00
05/14/25	K. Nixon	Phone calls with CRO re: expert report and research insolvency under relevant case law.	0.80	388.00
Current Legal Fees:			2.20	\$ 1,067.00

Invoice Totals

Total for Current Legal Fees: \$ 1,067.00

Total For Current Invoice: \$ 1,067.00



Invoice: 1934453
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against LTC – The Don, LLC

Total for Current Legal Fees: \$ 593.50

Total For Current Invoice: \$ 593.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Fredrikson

Invoice: 1934453
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927559	381.00		381.00
Total Prior Balance:				\$ 381.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934453
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/25	S. Kinsella	Finalize settlement agreement.	0.20	127.00
05/08/25	S. Kinsella	Finalize settlement agreement.	0.20	127.00
05/08/25	K. Nixon	Draft and finalize motion to approve settlement.	0.60	291.00
05/09/25	K. Nixon	Email CRO re: filing of motion to approve settlement.	0.10	48.50
Current Legal Fees:			1.10	\$ 593.50

Invoice Totals

Total for Current Legal Fees: \$ 593.50

Total For Current Invoice: \$ 593.50



Invoice: 1934454
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0011

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against 36th and Veterans, LLC

Total for Current Legal Fees: \$ 1,016.00

Total For Current Invoice: \$ 1,016.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934454
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927560	1,586.50		1,586.50
Total Prior Balance:				\$ 1,586.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934454
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0011

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/25	S. Kinsella	Review discovery requests.	0.10	63.50
05/28/25	S. Kinsella	Phone call and follow up communications with counsel for 36th & Veterans, EPIC Place, and West Fargo Dive Bar regarding status conference, motions for default, discovery, and settlement (.7); phone call with CRO regarding the same (.8).	1.50	952.50
Current Legal Fees:			1.60	\$ 1,016.00

Invoice Totals

Total for Current Legal Fees: \$ 1,016.00

Total For Current Invoice: \$ 1,016.00

Fredrikson

Invoice: 1934455
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0012

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against LTC – The Lincoln, LLC

Total for Current Legal Fees: \$ 339.50

Total For Current Invoice: \$ 339.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934455
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927561	257.50		257.50
Total Prior Balance:				\$ 257.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934455
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0012

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/13/25	K. Nixon	Emails A. Swedberg re: proposed dates in scheduling order.	0.30	145.50
05/20/25	K. Nixon	Attend scheduling conference.	0.40	194.00
Current Legal Fees:			0.70	\$ 339.50

Invoice Totals

Total for Current Legal Fees: \$ 339.50

Total For Current Invoice: \$ 339.50

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Regarding: Adversary against Pioneer Place Holdings, LLC

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Communications concerning disputed debts, including an instrument tendered as full satisfaction of a debt, are to be sent to Fredrikson, Attn: Credit Department, 60 South Sixth Street, Suite 1500, Minneapolis, MN 55402



Invoice: 1934456
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927562	291.00		291.00
Total Prior Balance:				\$ 291.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934456
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/07/25	S. Kinsella	Analyze service issue for default judgment motions.	0.20	127.00
05/07/25	K. Nixon	Draft declaration regarding service on Defendant.	0.40	194.00
Current Legal Fees:			0.60	\$ 321.00

Costs and Other Charges

	<u>Amount</u>
05/21/25 US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo Barr-Muscha 051525 - ND Odyssey - Filing of Foreign Judgment	10.00
Current Costs and Other Charges:	\$ 10.00

Invoice Totals

Total for Current Legal Fees:	\$ 321.00
Total For Current Costs and Other Charges:	\$ 10.00
Total For Current Invoice:	\$ 331.00

Fredrikson

Invoice: 1934457
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0015

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against Area 57 Association, Inc.

Total for Current Legal Fees: \$ 242.50

Total For Current Invoice: \$ 242.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934457
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927564	239.00		239.00
Total Prior Balance:				\$ 239.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934457
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0015

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/25	K. Nixon	Domesticate judgment in North Dakota state court.	0.40	194.00
05/05/25	K. Nixon	Email CRO re: domestication proceeding.	0.10	48.50
Current Legal Fees:			0.50	\$ 242.50

Invoice Totals

Total for Current Legal Fees: \$ 242.50

Total For Current Invoice: \$ 242.50

Fredrikson

Invoice: 1934458
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0016

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against HI West Acres, LLC, f/k/a EPIC Hospitality, LLC

Total for Current Legal Fees: \$ 97.00

Total For Current Invoice: \$ 97.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934458
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927565	1,324.50		1,324.50
Total Prior Balance:				\$ 1,324.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934458
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0016

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/15/25	K. Nixon	Draft expert disclosures and send to defense counsel.	0.20	97.00
Current Legal Fees:			0.20	\$ 97.00

Invoice Totals

Total for Current Legal Fees: \$ 97.00

Total For Current Invoice: \$ 97.00

Fredrikson

Invoice: 1934549
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary action against EPIC Holdings LLC

Total for Current Legal Fees: \$ 4,699.00

Total For Current Invoice: \$ 4,699.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934549
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927566	2,543.50		2,543.50
Total Prior Balance:				\$ 2,543.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934549
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/05/25	S. Kinsella	Begin drafting settlement agreement and communications with client regarding the same.	0.90	571.50
05/06/25	S. Kinsella	Draft settlement agreement.	3.30	2,095.50
05/07/25	S. Kinsella	Draft settlement agreement.	0.20	127.00
05/08/25	S. Kinsella	Continue to draft settlement agreement.	0.70	444.50
05/12/25	S. Kinsella	Communications with opposing counsel.	0.10	63.50
05/13/25	S. Kinsella	Review and revise expert report.	0.50	317.50
05/14/25	S. Kinsella	Revise expert report and communications with CRO regarding the same.	0.70	444.50
05/16/25	S. Kinsella	Revise settlement agreement and send to opposing counsel.	0.40	254.00
05/27/25	S. Kinsella	Phone call with opposing counsel regarding settlement.	0.20	127.00
05/30/25	S. Kinsella	Communications with opposing counsel regarding settlement agreement.	0.20	127.00
05/31/25	S. Kinsella	Review edits to settlement agreement.	0.20	127.00
Current Legal Fees:			7.40	\$ 4,699.00

Invoice Totals

Total for Current Legal Fees: \$ 4,699.00

Total For Current Invoice: \$ 4,699.00

Fredrikson

Invoice: 1934459
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0019

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against Fargo South Hospitality, LLC

Total for Current Legal Fees: \$ 485.00

Total For Current Invoice: \$ 485.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Invoice: 1934459
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927567	209.00		209.00
Total Prior Balance:				\$ 209.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934459
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0019

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/02/25	K. Nixon	Email CRO re: filing of defendant's jury trial brief.	0.10	48.50
05/06/25	K. Nixon	Draft discovery requests to Defendant.	0.90	436.50
Current Legal Fees:			1.00	\$ 485.00

Invoice Totals

Total for Current Legal Fees: \$ 485.00

Total For Current Invoice: \$ 485.00

Fredrikson

Invoice: 1934460
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0020

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against BA Downtown, LLC

Total for Current Legal Fees: \$ 339.50

Total For Current Invoice: \$ 339.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934460
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927568	239.50		239.50
Total Prior Balance:				\$ 239.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934460
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0020

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/07/25	K. Nixon	Draft declaration regarding service on Defendant.	0.40	194.00
05/29/25	K. Nixon	Domesticate judgment in state court and coordinate obtaining garnishment check.	0.30	145.50
Current Legal Fees:			0.70	\$ 339.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	0.70	339.50
Total		0.70	\$ 339.50

Invoice Totals

Total for Current Legal Fees: \$ 339.50

Total For Current Invoice: \$ 339.50

Fredrikson

Invoice: 1934461
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0022

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against EPIC Place, LLC

Total for Current Legal Fees: \$ 414.50

Total For Current Invoice: \$ 414.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934461
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927569	191.00		191.00
Total Prior Balance:				\$ 191.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934461
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0022

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/27/25	K. Nixon	Respond to email from defense counsel re: mail service.	0.10	48.50
05/28/25	S. Kinsella	Review purchase agreement and discuss the same with client.	0.10	63.50
05/28/25	K. Nixon	Withdraw motion for default judgment.	0.10	48.50
05/29/25	S. Kinsella	Prepare for and participate in scheduling conference.	0.40	254.00
Current Legal Fees:			0.70	\$ 414.50

Invoice Totals

Total for Current Legal Fees: \$ 414.50

Total For Current Invoice: \$ 414.50



Invoice: 1934462
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0023

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against The Tracks - Maverick, LLC

Total for Current Legal Fees: \$ 242.50

Total For Current Invoice: \$ 242.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934462
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927570	436.50		436.50
Total Prior Balance:				\$ 436.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934462
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0023

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/06/25	K. Nixon	Draft discovery requests to Defendant.	0.50	242.50
	Current Legal Fees:		0.50	\$ 242.50

Invoice Totals

Total for Current Legal Fees: \$ 242.50

Total For Current Invoice: \$ 242.50

Fredrikson

Invoice: 1934463
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0024

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against CBE, LLC

Total for Current Legal Fees: \$ 485.00

Total For Current Invoice: \$ 485.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934463
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927571	191.00		191.00
Total Prior Balance:				\$ 191.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934463
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0024

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/07/25	K. Nixon	Draft declaration regarding service on Defendant.	0.70	339.50
05/29/25	K. Nixon	Domesticate judgment in state court and coordinate obtaining garnishment check.	0.30	145.50
Current Legal Fees:			1.00	\$ 485.00

Invoice Totals

Total for Current Legal Fees: \$ 485.00

Total For Current Invoice: \$ 485.00

Fredrikson

Invoice: 1934464
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0025

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against EOLA Landholdings, LLC

Total for Current Legal Fees: \$ 339.50

Total For Current Invoice: \$ 339.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934464
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927572	433.50		433.50
Total Prior Balance:				\$ 433.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934464
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0025

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/07/25	K. Nixon	Draft declaration regarding service on Defendant.	0.40	194.00
05/29/25	K. Nixon	Domesticate judgment in state court and coordinate obtaining garnishment check.	0.30	145.50
Current Legal Fees:			0.70	\$ 339.50

Invoice Totals

Total for Current Legal Fees: \$ 339.50

Total For Current Invoice: \$ 339.50



Invoice: 1934465
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0026

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Dutch Mill Development LLC

Total for Current Legal Fees: \$ 145.50

Total For Current Invoice: \$ 145.50

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

[REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934465
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0026

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/28/25	K. Nixon	Draft and finalize motion for default judgment.	0.20	97.00
05/29/25	K. Nixon	Email CRO filed copy of motion for default judgment.	0.10	48.50
Current Legal Fees:			0.30	\$ 145.50

Invoice Totals

Total for Current Legal Fees: \$ 145.50

Total For Current Invoice: \$ 145.50



Invoice: 1934466
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0027

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against Northern Mall Partners, LLC

Total for Current Legal Fees: \$ 530.00

Total For Current Invoice: \$ 530.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

[REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1934466
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927573	1,923.50		1,923.50
Total Prior Balance:				\$ 1,923.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934466
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0027

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/05/25	K. Nixon	Review order approving settlement and email CRO re: the same.	0.20	97.00
05/08/25	S. Kinsella	Communications with opposing counsel regarding settlement payment.	0.10	63.50
05/08/25	K. Nixon	Check status of settlement payment from Defendant.	0.10	48.50
05/13/25	K. Nixon	Email client re: status of settlement payment.	0.10	48.50
05/14/25	S. Kinsella	Communications with opposing counsel regarding settlement payment.	0.10	63.50
05/16/25	K. Nixon	Draft and finalize notice of voluntary dismissal with prejudice.	0.30	145.50
05/17/25	S. Kinsella	Attention to settlement payment and filing of dismissal motion and communications with opposing counsel regarding the same.	0.10	63.50
Current Legal Fees:			1.00	\$ 530.00

Invoice Totals

Total for Current Legal Fees: \$ 530.00

Total For Current Invoice: \$ 530.00



Invoice: 1934467
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0028

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against West Fargo Dive Bar, LLC

Total for Current Legal Fees: \$ 1,591.00

Total For Current Invoice: \$ 1,591.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934467
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927574	1,213.50		1,213.50
Total Prior Balance:				\$ 1,213.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934467
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0028

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/07/25	S. Kinsella	Review answer.	0.20	127.00
05/19/25	K. Nixon	Return phone call from court staff re: status of motion for default judgment.	0.10	48.50
05/28/25	S. Kinsella	Review objection to motion for default judgment.	0.10	63.50
05/28/25	K. Nixon	Send proposed scheduling order dates to defense counsel.	0.20	97.00
05/29/25	S. Kinsella	Prepare for and participate in hearing on motion for default judgment (1.2); follow up call with client (.7).	1.90	1,206.50
05/29/25	K. Nixon	Email CRO re: Court's ruling on motion for default judgment.	0.10	48.50
Current Legal Fees:			2.60	\$ 1,591.00

Invoice Totals

Total for Current Legal Fees: \$ 1,591.00

Total For Current Invoice: \$ 1,591.00



Invoice: 1934468
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0029

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through May 31, 2025

Regarding: Adversary against Makt, LLC

Total for Current Legal Fees: \$ 145.50

Total For Current Invoice: \$ 145.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

[REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934468
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927575	191.00		191.00
Total Prior Balance:				\$ 191.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1934468
Invoice Date: June 3, 2025
Client Number: 097807
Matter Number: 097807.0029

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/29/25	K. Nixon	Domesticate judgment in state court and coordinate obtaining garnishment check.	0.30	145.50
Current Legal Fees:			0.30	\$ 145.50

Invoice Totals

Total for Current Legal Fees: \$ 145.50

Total For Current Invoice: \$ 145.50

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Regarding: Case Administration

Total For Current Costs and Other Charges:	\$ 5,404.17
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Total For Current Invoice: **\$ 5,404.17**

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1934544
Invoice Date: June 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
05/02/25	1927576	85.00		85.00
Total Prior Balance:				\$ 85.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of June 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1934544
 Invoice Date: June 3, 2025
 Client Number: 097807
 Matter Number: 097807.5000

EPIC Companies Midwest, LLC
 Attn: Patrick Finn
 900 Long Lake Rd, Suite 180
 Lighthouse Management Group, Inc.
 New Brighton, MN 55112

Costs and Other Charges

		<u>Amount</u>
04/11/25	Prof Serv Karen Klein Mediation, LLC (3523 45th Street South Fargo ND 58104) - 2508 - Mediation	4,000.00
05/05/25	COURTS/USBC-ND-T - Certified Copy of Judgment	13.00
05/06/25	Filing fee Bravera Bank (PO Box 2197 Bismarck ND 58505) - 5.6.25 - Garnishment Check	25.00
05/19/25	Prof Serv North Dakota District Court (PO Box 2806 Fargo ND 58108) - 5.19.25 - Writ Execution Fee	10.00
05/22/25	COURTS/USBC-ND-T - Certified Copies of Judgments	50.50
05/27/25	Filing fee North Dakota District Court (PO Box 2806 Fargo ND 58108) - 5.27.25 - Writ of Execution	10.00
05/29/25	Filing fee First Western Bank and Trust (PO Box 1090 Minot ND 58702-1090) - 5.29.24 - Garnishment for Greenfield	15.00
05/29/25	Filing fee First Western Bank and Trust (PO Box 1090 Minot ND 58702-1090) - 5.29.24-2 - Garnishment for Greenfield	15.00
05/29/25	Filing fee Bravera Bank (PO Box 2197 Bismarck ND 58505) - 5.29.24 - Garnishment for Greenfield Commons	15.00
05/29/25	Filing fee Cornerstone Bank (2280 45th Street South Fargo ND 58104) - 5.29.24 - Garnishment for Greenfield Commons	15.00
05/29/25	Filing fee Bravera Bank (PO Box 2197 Bismarck ND 58505) - 5.29.24-2 - Garnishment for Greenfield Commons	15.00
05/29/25	Filing fee First International Bank & Trust (100 North Main Street Watford City ND 58854) - 5.29.24 - Garnishment for Area 57	15.00
05/29/25	Filing fee Bremer Bank - 5.29.24 - Garnishment for Greenfield Commons	15.00
05/30/25	Filing fee Alerus Financial (PO Box 64535 St Paul MN 55164-0535) - 5.30.25 - Garnishment for BA Downtown	25.00
05/30/25	Filing fee Bravera Bank (PO Box 2197 Bismarck ND 58505) - 5.30.25 - Garnishment for Greenfield Commons	25.00
05/30/25	Filing fee Bravera Bank (PO Box 2197 Bismarck ND 58505) - 5.30.25-2 - Garnishment for Greenfield Commons	25.00
05/30/25	Filing fee Cornerstone Bank (2280 45th Street South Fargo ND 58104) - 5.30.25 - Garnishment for Greenfield Commons	25.00
05/30/25	Filing fee First Western Bank and Trust (PO Box 1090 Minot ND 58702-1090) - 5.30.25 - Garnishment for Greenfield	25.00
05/30/25	Filing fee First Western Bank and Trust (PO Box 1090 Minot ND 58702-1090) - 5.30.25-2 - Garnishment for Greenfield	25.00

Fredrikson

Invoice: 1934544
Invoice Date: June 3, 2025
Page: 2

05/30/25	Filing fee Western State Bank (110 4th St SE Devils Lake ND 58301) - 5.30.25-2 - Garnishment for CBE	25.00
05/30/25	Filing fee Western State Bank (110 4th St SE Devils Lake ND 58301) - 5.30.25 - Garnishment for CBE	25.00
05/30/25	Filing fee First Western Bank and Trust (PO Box 1090 Minot ND 58702-1090) - 5.30.25-4 - Garnishment for Greenfield	25.00
05/30/25	Filing fee First International Bank & Trust (100 North Main Street Watford City ND 58854) - 5.30.25 - Garnishment for Area 57	25.00
05/30/25	Filing fee First Western Bank and Trust (PO Box 1090 Minot ND 58702-1090) - 5.30.25-3 - Garnishment for Greenfield	25.00
05/30/25	Filing fee Bremer Bank - 5.30.25 - Garnishment for Greenfield Commons III	25.00
05/30/25	Filing fee Bremer Bank - 5.30.25-2 - Garnishment for Greenfield Commons III	25.00
	Postage Charges	865.67

Current Costs and Other Charges: \$ 5,404.17

Invoice Totals

Total For Current Costs and Other Charges: \$ 5,404.17

Total For Current Invoice: \$ 5,404.17

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**NOTICE OF TENTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR
ALLOWANCE OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE
DEBTORS FROM MAY 1, 2025 THROUGH MAY 31, 2025**

TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Fredrikson & Byron, P.A., as Chapter 11 counsel for the Debtors, has filed its tenth application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **Tuesday, July 15, 2025, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served may be deemed waived.

Dated: June 24, 2025

/s/ Steven R. Kinsella

Michael S. Raum (#05676)

FREDRIKSON & BYRON, P.A.

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

mraum@fredlaw.com

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

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60 South 6th Street, Suite 1500

Minneapolis, MN 55402-4400

612.492.7000

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ATTORNEYS FOR DEBTORS